

Kristin A. Zilberstein, Esq. (SBN 24104960)
Philip S. Traynor, Esq. (SBN 24083985)
GHIDOTTI | BERGER LLP
600 E. John Carpenter Fwy., Ste. 175
Irving, TX 75062
Ph: (949) 427-2010
Fax: (949) 427-2732
kzilberstein@ghidottiberger.com

Attorneys for Movant,
U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE LODGE SERIES
III TRUST

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

Mark Nicholas D'Amato

DEBTOR,

**U.S. BANK TRUST NATIONAL
ASSOCIATION, AS TRUSTEE OF THE
LODGE SERIES III TRUST,**

MOVANT.

§ CASE NO.: 19-42814

§

§ CHAPTER 13

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

///

///

///

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTORS, AND ALL
INTERESTED PARTIES

PLEASE TAKE NOTICE that GHIDOTTI|BERGER, LLP, attorneys for U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE LODGE SERIES III TRUST requests special notice of all events relevant to the above referenced bankruptcy and copies of all pleadings or documents filed in relation to the above referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors' committees and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

GHIDOTTI|BERGER, LLP, requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:

GHIDOTTI|BERGER, LLP
1920 Old Tustin Ave.
Santa Ana, CA 92705
Telephone (949) 427-2010 – Fax: (949) 427-2732
bknotifications@ghidottiberger.com

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's:

- a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;
- b. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core

proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;

- c. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved by this party without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: November 14, 2019

Respectfully submitted,

/S/ Kristin A. Zilberstein
Kristin A. Zilberstein, Esq.
State Bar No.: 24104960
600 E John Carpenter Fwy., Ste. 175
Irving, TX 75062
Tel: (949) 427-2010
Fax: (949) 427-2732
kzilberstein@ghidottiberger.com
COUNSEL FOR MOVANT

CERTIFICATE OF SERVICE

On November 14, 2019, I served the foregoing documents described as Request for Special Notice on the following individuals by electronic means through the Court's ECF program:

COUNSEL FOR DEBTOR
Mark S. Rubin
bankruptcy2@rubin-owens.com

TRUSTEE
Carey D. Ebert
ECFch13plano@ch13plano.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Kasra Sadjadi
Kasra Sadjadi

On November 14, 2019, I served the foregoing documents described as Request for Special Notice on the following individuals by depositing true copies thereof in the United States mail at Santa Ana, California enclosed in a sealed envelope, with postage paid, addressed as follows:

DEBTOR Mark Nicholas D'Amato 109 Links Lane Aleto, TX 76008	U.S. TRUSTEE US Trustee Office of the U.S. Trustee 110 N. College Ave. Suite 300 Tyler, TX 75702
----------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Kasra Sadjadi
Kasra Sadjadi